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ATTORNEYS FOR PREMIUM ASSIGNMENT CORPORATION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
BUFFET PARTNERS, L.P.	§	Case No. 14-30699 (HDH)
	§	
Debtor.	§	

**MOTION FOR SETTING AND  
REQUEST FOR EXPEDITED HEARING ON MOTION OF  
PREMIUM ASSIGNMENT CORPORATION FOR RELIEF FROM  
THE AUTOMATIC STAY AND REQUEST FOR ADEQUATE PROTECTION**

1. Premium Assignment Corporation (“PAC”) hereby requests that a hearing be set on the Motion of Premium Assignment Corporation for Relief from the Automatic Stay and Request for Adequate Protection (the “*Motion*”) on the next scheduled omnibus hearing date of **March 19, 2014 at 2:00 p.m. (CST)**. Scheduling a hearing by such date is necessary for PAC to expeditiously exercise its rights under state law, in accordance with Texas Insurance Code Chapter 651, to cancel insurance policies financed by PAC for the benefit of Buffet Partners, LP. (the “*Debtor*”) and collect unearned premiums on account of the same, because the value of PAC’s collateral is irreparably declining and is not adequately protected.

2. Notice of the proposed expedited hearing will be provided to Debtor and all parties entitled to receive notice of hearings via the Court’s ECF system and via regular first class mail. Such notice is sufficient under the circumstances, and no further notice is necessary.

3. A hearing was not requested earlier because the Debtor only recently defaulted under the terms of the relevant premium finance agreement, and a consensual resolution has not been reached as of the date hereof.

Dated: March 7, 2014.

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By: /s/ Sarah J. Crow

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ATTORNEYS FOR PREMIUM ASSIGNMENT  
CORPORATION

**CERTIFICATE OF CONFERENCE**

I hereby certify that on March 4, 2014, I conferred with the Debtor's counsel in order to reach a consensual resolution to the relief sought in the Motion. In addition, on March 5 and 6, 2014, I attempted to contact the Debtor's counsel to reach a consensual resolution regarding PAC's request for an expedited hearing. As of the date of the filing of the foregoing document, no such resolution has been reached.

/s/ Sarah J. Crow

Sarah J. Crow

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of this motion was served on the parties entitled to receive service through the Court's Electronic Case Filing System and via United States mail, postage prepaid, to the parties listed on the attached Service List, and specifically on the following parties via email, on this, the 7<sup>th</sup> day of March 2014.

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/s/ Sarah J. Crow

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**SERVICE LIST**

**SERVED VIA REGULAR MAIL**

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